

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

David S. Stone (DS 8580)
BOIES, SCHILLER & FLEXNER LLP
150 John F. Kennedy Parkway
Short Hills, New Jersey 07078
(973) 218-1111
Counsel for Plaintiff
BROADCOM CORPORATION

BROADCOM CORPORATION,

Plaintiff,

v.

QUALCOMM INCORPORATED,

Defendant.

Civil Action No. 05-3350

**NOTICE OF MOTION TO ADMIT
KATE SAXTON, ESQ. AND CARRIE H.
SEARES, ESQ. *PRO HAC VICE***

TO: William J. O'Shaughnessy
McCarter & English
Four Gateway Center
100 Mulberry St.
Newark, NJ 07102

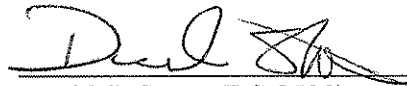
David R. Marriott
Cravath, Swaine & Moore LLP
825 Eighth Avenue
New York, New York 10019

Attorneys for Defendant

PLEASE TAKE NOTICE, that on February 4, 2008 at 9:30am, or as soon as counsel may be heard, the undersigned attorneys for Plaintiff Broadcom Corporation will move before the Hon. John J. Hughes, at the Clarkson S. Fisher Building & U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an Order pursuant to L.Civ.R. 101.1(c) granting **Kate**

Saxton, Esq. and **Carrie H. Seares, Esq.** of the firm Wilmer Cutler Pickering Hale and Dorr LLP, 60 State Street, Boston, MA 02109, admission to this Court *pro hac vice*. The basis for this motion is set forth by counsel for Plaintiff, David S. Stone, in the attached Affidavit in Support of Plaintiff's Motion for an Order to admit Kate Saxton *pro hac vice* and Affidavit in Support of Plaintiff's Motion for an Order to admit Carrie H. Seares *pro hac vice*. Defendant's Counsel, Cravath, Swaine & Moore LLP have consented to this motion.

A Proposed Order is attached.


David S. Stone (DS 8580)

Dated: January 11, 2008

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

David S. Stone
BOIES, SCHILLER & FLEXNER LLP
150 John F. Kennedy Parkway
Short Hills, New Jersey 07078
(973) 218-1111
Counsel for Plaintiff
BROADCOM CORPORATION

BROADCOM CORPORATION,

Plaintiff,

v.

QUALCOMM INCORPORATED,

Defendant.

Civil Action No. 05-3350

**AFFIDAVIT OF DAVID S. STONE IN
SUPPORT OF PLAINTIFF'S MOTION
TO ADMIT KATE SAXTON, ESQ. AND
CARRIE H. SEARES, ESQ. *PRO HAC
VICE***

STATE OF NEW JERSEY)
) SS:
COUNTY OF ESSEX)

DAVID S. STONE, having been duly sworn according to his oath, deposes and says:

1. I am an attorney at law in the State of New Jersey and a member of the bar of this Court, as well as a member of the law firm of Boies, Schiller and Flexner LLP, which represents Plaintiff Broadcom Corporation in the above matter. I have personal knowledge of what is stated below and make this Affidavit in support of a motion, pursuant to L.Civ.R.101.1(c), to admit Kate Saxton, Esq. and Carrie H. Seares, Esq. *pro hac vice* in the above matter.

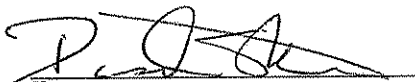
2. Ms. Saxton and Ms. Seares are members of the firm Wilmer Cutler Pickering Hale and Dorr LLP, and have been asked by plaintiff Broadcom to be involved in this case

because of their extensive experience with the antitrust issues at issue in this case, and their prior experiences with Broadcom in other matters.

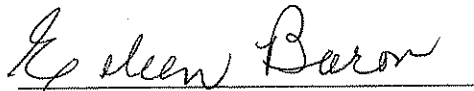
3. As more fully set forth in their Affidavits, Ms. Saxton and Ms. Seares are members in good standing of a number of different courts.

4. Upon admission of Ms. Saxton and Ms. Seares *pro hac vice*, I will continue to participate and serve as counsel of record in this matter. In addition, I will ensure that payment is made for Ms. Saxton and Ms. Seares to the New Jersey Lawyers' Fund for Client Protection, as provided by R. 1:28-2(a).

5. Our adversary, Qualcomm Corporation, through its counsel, Cravath, Swaine and Moore LLP, has consented to the *pro hac vice* admission of Ms. Saxton and Ms. Seares.


David S. Stone

Sworn to before me and
subscribed in my presence
this 11th day of January, 2008


Notary Public

EILEEN BARON
NOTARY PUBLIC OF NEW JERSEY
My Commission Expires Sept. 3, 2011

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

David S. Stone (DS 8580)
BOIES, SCHILLER & FLEXNER LLP
150 John F. Kennedy Parkway
Short Hills, New Jersey 07078
(973) 218-1111
Counsel for Plaintiff
BROADCOM CORPORATION

BROADCOM CORPORATION, Plaintiff, v. QUALCOMM INCORPORATED, Defendant.	Civil Action No. 05-3350 AFFIDAVIT OF KATE SAXTON IN SUPPORT OF PLAINTIFF'S <i>PRO HAC VICE</i> MOTION
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STATE OF NEW YORK)
) SS:
COUNTY OF NEW YORK)

KATE SAXTON, having been duly sworn according to her oath, deposes and says:

1. I am a member in good standing of the Bar of the Commonwealth of Massachusetts, to which I was admitted in 2002. I am also a member in good standing of the Bar of the United States District Court for the District of Massachusetts. I make this Affidavit in support of this Motion to allow me to appear in the above-captioned case *pro hac vice*.
2. I am not currently suspended or disbarred in any court and am of good moral character.

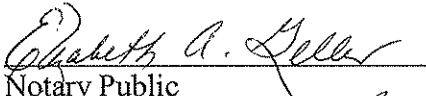
3. I represent Broadcom Corporation in the above-captioned action. I am associated in this matter with David S. Stone of the firm, Boies, Schiller & Flexner LLP, located at 150 John F. Kennedy Parkway, Short Hills, New Jersey 07078.

5. If admitted to practice before this Court in this case, I will conduct myself in accordance with the Rules governing the conduct of attorneys admitted to practice before this Court, and pay all appropriate fees.

I declare under penalty of perjury that the foregoing is true and correct.


Kate Saxton

Sworn to before me and
subscribed in my presence
this 10th day of January, 2008.


Notary Public
Comm. Expires: September 12, 2008

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY

David S. Stone (DS 8580)
BOIES, SCHILLER & FLEXNER LLP
150 John F. Kennedy Parkway
Short Hills, New Jersey 07078
(973) 218-1111
Counsel for Plaintiff
BROADCOM CORPORATION

BROADCOM CORPORATION, Plaintiff, v. QUALCOMM INCORPORATED, Defendant.	Civil Action No. 05-3350 AFFIDAVIT OF CARRIE H. SEARES IN SUPPORT OF PLAINTIFF'S <i>PRO HAC VICE</i> MOTION
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STATE OF NEW YORK)
) SS:
COUNTY OF NEW YORK)

CARRIE H. SEARES, having been duly sworn according to her oath, deposes and
says:

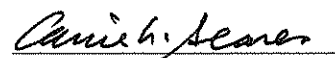
1. I am a member in good standing of the Bar of the Commonwealth of
Massachusetts, to which I was admitted in 2006. I am also a member in good standing of
the Bar of the United States District Court for the District of Massachusetts. I make this
Affidavit in support of this Motion to allow me to appear in the above-captioned case *pro
hac vice*.

2. I am not currently suspended or disbarred in any court and am of good moral character.

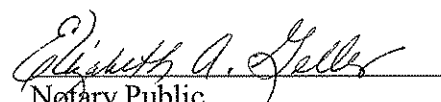
3. I represent Broadcom Corporation in the above-captioned action. I am associated in this matter with David S. Stone of the firm, Boies, Schiller & Flexner LLP, located at 150 John F. Kennedy Parkway, Short Hills, New Jersey 07078.

5. If admitted to practice before this Court in this case, I will conduct myself in accordance with the Rules governing the conduct of attorneys admitted to practice before this Court, and pay all appropriate fees.

I declare under penalty of perjury that the foregoing is true and correct.


Carrie H. Seares

Sworn to before me and
subscribed in my presence
this 10th day of January, 2008.


Notary Public
Comm. Expires: September 12, 2008

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

David S. Stone (DS 8580)
BOIES, SCHILLER & FLEXNER LLP
150 John F. Kennedy Parkway
Short Hills, New Jersey 07078
(973) 218-1111
Counsel for Plaintiff
BROADCOM CORPORATION

<p>BROADCOM CORPORATION,</p> <p style="text-align: center;">Plaintiff,</p> <p style="text-align: center;">v.</p> <p>QUALCOMM INCORPORATED,</p> <p style="text-align: center;">Defendant.</p>	<p>Civil Action No. 05-3350</p> <p>ORDER ADMITTING KATE SAXTON, ESQ. AND CARRIE H. SEARES, ESQ. PRO HAC VICE PURSUANT TO L. CIV. R. 101.1(C)</p>
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THIS MATTER, having been brought before the Court by Boies, Schiller & Flexner LLP, counsel for plaintiff Broadcom Corporation in the above matter, for an Order pursuant to L.Civ.R. 101.1(c) permitting Kate Saxton, Esq. and Carrie H. Seares, Esq. of Wilmer Cutler Pickering Hale and Dorr LLP, located at 60 State Street, Boston, MA 02109 to appear and practice *pro hac vice*; and the Court having considered the Affidavit of David S. Stone, the Affidavit of Kate Saxton and the Affidavit of Carrie H. Seares; and for good cause shown:

IT IS on this _____ day of January, 2008;

ORDERED that the motion by Boies, Schiller & Flexner LLP to permit Kate Saxton, Esq. and Carrie H. Seares, Esq. to appear and participate *pro hac vice* is GRANTED; and

FURTHER ORDERED that all pleadings, briefs and other papers filed with the Court shall be signed by David S. Stone, or a member or associate of the Firm Boies Schiller & Flexner

LLP, 150 John F. Kennedy Parkway, Short Hills, New Jersey 07078, who is a member in good standing of the bar of this Court, who shall be responsible for said papers and for the conduct of this case and who shall be present before the Court, as well as be held responsible for the conduct of the attorney admitted *pro hac vice* pursuant to the terms of this order; and

FURTHER ORDERED that Kate Saxton, Esq. and Carrie H. Seares, Esq. shall pay the annual fee to the New Jersey Lawyers' Fund for Client Protection, in accordance with R. 1:28-2 within 20 days from the dated entry of this Order; and

FURTHER ORDERED that Kate Saxton, Esq. and Carrie H. Seares, Esq. shall be bound by the Local Civil Rules of the United States District Court for the District of New Jersey, including the provisions of L.Civ.R. 103.1 (Judicial Ethics and Professional Responsibility) and L.Civ.R. 104.1 (Discipline of Attorneys).

Hon. John J. Hughes, U.S.M.J.

Dated: January __, 2008

CERTIFICATE OF SERVICE

I, David S. Stone, Esq. hereby certify that the foregoing Notice of Motion to Admit Kate Saxton, Esq. and Carrie H. Seares, Esq. *Pro Hac Vice*, Affidavit of David S. Stone, Affidavit of Kate Saxton, Affidavit of Carrie H. Seares, and Proposed Order, was filed and served electronically on January 11, 2008 on counsel for all named parties through the Court's *ECF system*, including:

William J. O'Shaughnessy, Esq.
McCARTER & ENGLISH, LLP
Four Gateway Center
100 Mulberry Street
Newark, NJ 07102-4056

David R. Marriott, Esq.
CRAVATH, SWAINE & MOORE LLP
Worldwide Plaza
825 Eighth Avenue
New York, NY 10019

Steven J. Kaiser, Esq.
CLEARY, GOTTLEIB, STEIN & HAMILTON
200 Pennsylvania Avenue, NW
Washington, DC 20006


David S. Stone, Esq.